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ATTACHMENT F – FACT SHEET

As described in Section II of this Order, this Fact Sheet includes the legal requirements and technical rationale that serve as the basis for the requirements of this Order.

I. PERMIT INFORMATION

The following table summarizes administrative information related to the facility.

WDID	1B831470HUM
Discharger	Redway Community Services District
Name of Facility	Redway Wastewater Treatment Plant
Facility Address	No. 1 Sewer Plant Road
	Redway, CA 95560
	Humboldt County
Facility Contact, Title and Phone	Kenneth Dean, Operations Manager (707) 923-3101
Authorized Person to Sign and Submit Reports	Kenneth Dean, Operations Manager
Mailing Address	PO Box 40, Redway, CA 95560
Billing Address	SAME
Type of Facility	Municipal Waste Water Treatment Facility (WWTF)
Major or Minor Facility	Minor
Threat to Water Quality	2
Complexity	B
Pretreatment Program	N/A
Reclamation Requirements	N/A
Facility Permitted Flow	0.186
Facility Design Flow	0.186
Watershed	Eel River, South Fork Hydrologic Unit, Benbow Sub Unit
Receiving Water	Eel River
Receiving Water Type	Inland Surface Water

A. The Redway Community Services District (hereinafter Discharger) is the owner and operator of the Redway Wastewater Treatment Plant (hereinafter Facility), a municipal wastewater treatment plant.

B. The Facility discharges wastewater to the Eel River, a water of the United States and is currently regulated by Waste Discharge Requirements Order No. R1-2000-25, which was adopted on February 24, 2000 and expired on February 24, 2005. The terms of the existing Order continue in effect after the permit expiration date.

C. The Discharger filed a report of waste discharge and submitted an application for renewal of its WDRs and National Pollutant Discharge Elimination System (NPDES) permit on

February 16, 2005. Supplemental Information was requested on November 15, 2005 and received on December 15, 2005.

II. FACILITY DESCRIPTION

A. Description of Collection System, Wastewater and Biosolids Treatment or Controls

The Redway Community Services District (hereinafter Discharger) owns and operates a secondary municipal wastewater treatment facility, associated collection system, and disposal facilities. The Facility serves a population of approximately 1,500, primarily residential, connections within the Community of Redway. The treatment system consists of a 300,000-gallon capacity oxidation ditch, clarification, and a chlorination/declorination system. Disinfected, secondary effluent is permitted for discharge to the Eel River, during the period September 15 to May 15 in accordance with the seasonal prohibitions. However, the Discharger relies primarily on upland percolations ponds for disposal of the treated effluent. The percolation ponds are located on property adjacent to the WWTF across a deep ravine. Treated wastewater is conveyed to the percolation ponds via a suspended transmission line. Although the percolation ponds appear to perform sufficiently to accept wintertime flows, the transmission line limits the amount of effluent that can be disposed in this manner. Consequently, due to wintertime infiltration and inflow (I/I), when flows exceed 0.350 million gallons per day (MGD), the Discharger transmits effluent to the Eel River for disposal.

Sludge solids are decanted to drying beds at the Facility. Historically, the Discharger has been allowed to bury dried sludge in trenches on the wooded property owned by the Discharger above the Facility. Provision VI.C.2 of Order R1-2006-0022 requires the Discharger to evaluate, and propose alternatives to, its current sludge disposal method.

B. Discharge Points and Receiving Waters

The Facility discharges to the Eel River during the period September 30 to May 15 in accordance with the seasonal discharge prohibitions contained in the Basin Plan. Discharges may not exceed one percent of the Eel River's natural flow as measured at the USGS gauging station located in Miranda. During the period May 16 to September 30, the Facility discharges to a percolation pond located in an upland area away from the river channel and floodplain.

C. Summary of Existing Requirements and Self-Monitoring Report (SMR) Data

The existing Order contains effluent limitations for direct discharges to the Eel River (Discharge Point 001) and for discharges to the evaporation/percolation ponds (Discharge Point. 002). Effluent limitations contained in the existing Order as well as a summary of the monitoring data during the term of the previous Order are presented below.

Parameter (units)	Effluent Limitations		Monitoring Data (From January 2000 – To November 2005)		
	Average Monthly	Maximum Daily	Highest Average Monthly Result	Highest Daily Result	No. of Violations
BOD (20°C, 5-day) (mg/l)	30	60	29	29	0
Total Suspended Solids (mg/l)	50	80	160	160	3
Total Settleable Solids (ml/l)	0.1	0.2	0.45	1.5	2
Total Coliform Organisms (MPN/100 ml)	23*	230	>440*	>1600	3
Hydrogen Ion	Not less than 6.0 nor greater than 9.0		7.0	6.1-7.2**	0

Notes:
* Monthly median
** pH Range

D. Compliance Summary

Generally, the monthly average BOD and TSS concentration at the Facility are below 10 mg/l indicating the Facility is performing well. Settleable solids, another measure of performance, indicates the Facility is functioning well. The Facility has violated its coliform effluent limitations (daily maximum and monthly median) a total of 3 times between January 2000 and November 2005.

E. Planned Changes

Depending on the pursuit of options and the resultant outcomes from special studies required under Order R1-2006-0022, the Discharger may propose changes to the facility during the term of this permit. However, no changes are proposed at this time.

III. APPLICABLE PLANS, POLICIES, AND REGULATIONS

The requirements contained in the proposed Order are based on the requirements and authorities described in this section.

A. Legal Authorities

This Order is issued pursuant to section 402 of the Federal Clean Water Act (CWA) and implementing regulations adopted by the U.S. Environmental Protection Agency (USEPA) and Chapter 5.5, Division 7 of the California Water Code (CWC). It shall serve as a NPDES permit for point source discharges from this facility to surface waters. This Order also serves as WDRs pursuant to Article 4, Chapter 4 of the CWC for any discharges that are not subject to regulation under CWA section 402.

B. California Environmental Quality Act (CEQA)

This action to adopt an NPDES permit is exempt from Chapter 3 of the California Environmental Quality Act (Public Resources Code Section 21000, et seq.), in accordance with Section 13389 of the CWC.

C. State and Federal Regulations, Policies, and Plans

1. Water Quality Control Plans. The Regional Water Board adopted a Water Quality Control Plan for the North Coast Region (hereinafter Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan. Beneficial uses are designated for all waters of the North Coast Region and are designated for coastal and inland waters, wetlands, and ground waters. In addition, State Water Resources Control Board (State Water Board) Resolution No. 88-63 requires that, with certain exceptions, the Regional Water Board assign the municipal and domestic supply use to water bodies that do not have beneficial uses listed in the Basin Plan.

a. Beneficial uses applicable to the Eel River are as follows:

Discharge Point	Receiving Water	Beneficial Uses
003	**Eel River**	Existing: MUN – Municipal and Domestic Supply AGR – Agricultural Supply IND – Industrial Service Supply GWR – Groundwater Recharge FRSH – Freshwater Replenishment NAV – Navigation REC1 – Water Contact Recreation REC2 – Non-Contact Water Recreation COMM – Commercial and Sport Fishing COLD – Cold Freshwater Habitat WILD – Wildlife Habitat RARE – Preservation of Rare, Threatened, or Endangered Species MIGR – Migration of Aquatic Organisms SPWN – Spawning, Reproduction, and/or Early Development AQUA – Aquaculture Potential:

Discharge Point	Receiving Water	Beneficial Uses
		PRO – Industrial Process Supply POW – Hydropower Generation WARM – Warm Freshwater Habitat
	Groundwater	Existing: MUN – Municipal and Domestic Supply AGR – Agricultural Supply IND – Industrial Service Supply CUL – Native American Culture Potential: PRO – Industrial Process Supply AQUA – Aquaculture

b. The Basin Plan includes water quality objectives, implementation plans for point source and non-point source discharges, prohibitions, and statewide plans and policies.

c. The Basin Plan contains a narrative objective (standard) for toxicity that requires:

All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analyses of species diversity, population density, growth anomalies, bioassay of appropriate duration or other appropriate methods as specified by the Regional Water Board.

The survival of aquatic life in surface waters subjected to a waste discharge, or other controllable water quality factors, shall not be less than that for the same water body in areas unaffected by the waste discharge, or when necessary for other control water that is consistent with the requirements for "experimental water" as described in Standard Methods for the Examination of Water and Wastewater 18th Edition (1992). At a minimum, compliance with this objective as stated in the previous sentence shall be evaluated with a 96-hour bioassay.

In addition, effluent limits based upon acute bioassays of effluent will be prescribed. Where appropriate, additional numerical receiving water objectives for specific toxicants will be established as sufficient data become available, and source control of toxic substances will be encouraged.

2. **Thermal Plan.** The State Water Board adopted a *Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Water and Enclosed Bays and Estuaries of California* (Thermal Plan) on May 18, 1972, and amended this

plan on September 18, 1975. This plan contains temperature objectives for inland surface waters.

3. **National Toxics Rule (NTR) and California Toxics Rule (CTR).** USEPA adopted the NTR on December 22, 1992, which was amended on May 4, 1995 and November 9, 1999, and the CTR on May 18, 2000, which was amended on February 13, 2001. These rules include water quality criteria for priority pollutants and are applicable to this discharge.

4. **State Implementation Policy.** On March 2, 2000, the State Water Board adopted the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (State Implementation Policy or SIP). The SIP became effective on April 28, 2000 with respect to the priority pollutant criteria promulgated for California by the USEPA through the NTR and to the priority pollutant objectives established by the regional water boards in their basin plans. The SIP became effective on May 18, 2000 with respect to the priority pollutant criteria promulgated by the USEPA through the CTR. The State Water Board adopted amendments to the SIP on February 24, 2005 that became effective on July 13, 2005. The SIP includes procedures for determining the need for and calculating water quality-based effluent limitations (WQBELs), and requires Dischargers to submit data sufficient to do so.

5. **Antidegradation Policy.** Section 131.12 of 40 CFR requires that State water quality standards include an antidegradation policy consistent with the federal policy. The State Water Board established California's antidegradation policy in State Water Board Resolution 68-16, which incorporates the requirements of the federal antidegradation policy. Resolution 68-16 requires that the existing quality of waters be maintained unless degradation is justified based on specific findings. As discussed in detail in this Fact Sheet, the permitted discharge is consistent with the antidegradation provision of 40 CFR §131.12 and State Water Board Resolution 68-16.

6. **Anti-Backsliding Requirements.** Sections 402(o)(2) and 303(d)(4) of the CWA and 40 CFR §122.44(l) prohibit backsliding in NPDES permits. These anti-backsliding provisions require that effluent limitations in a reissued permit must be as stringent as those in the previous permit, with some exceptions in which limitations may be relaxed. All effluent limitations in the Order are at least as stringent as the effluent limitations in the previous Order.

7. **Monitoring and Reporting Requirements.** Section 122.48 of 40 CFR requires that all NPDES permits specify requirements for recording and reporting monitoring results. Sections 13267 and 13383 of the CWC authorize the regional water boards to require technical and monitoring reports. The Monitoring and Reporting Program (MRP), provided in Attachment E, establishes monitoring and reporting requirements to implement federal and State requirements.

D. Impaired Water Bodies on CWA 303(d) List

On June 5 and July 25, 2003, the USEPA approved the list of impaired water bodies, prepared by the State Water Resources Control Board pursuant to Section 303 (d) of the CWA – water bodies which are not expected to meet applicable water quality standards after implementation of technology-based effluent limitations for point sources.

The Eel River is listed as an impaired water body for sediment and temperature pursuant to Section 303(d) of the CWA. The Environmental Protection Agency on September 30, 1999 and January 1, 1999 adopted TMDL's pertaining to sediment and temperature in the South Fork Eel River, Hydrologic Unit 111.31. This hydrologic area begins several river miles downstream of the Redway WWTF's Discharge Point 001. Aspects of sediment impairing the Eel River include settleable solids, suspended solids, and turbidity. The impact of settleable solids results when they collect on the bottom of a waterbody over time, making them a persistent or accumulative constituent. The impact of suspended solids and turbidity, by contrast, results from their concentration in the water column. An analysis of the Discharger's monitoring data determined that the discharge does not contain sediment (e.g., settleable solids, suspended solids, and turbidity) at levels which will cause, have the reasonable potential to cause, or contribute to increases in sediment levels in the Eel River. This finding is based on the Facility's monitoring data, the 100:1 dilution rate the discharge receives in the river and the summer seasonal discharge prohibition.

E. Other Plans, Polices and Regulations

This section of the standardized template is not currently applicable to the Redway Facility.

IV. RATIONALE FOR EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS

The CWA requires point source discharges to control the amount of conventional, non-conventional, and toxic pollutants that are discharged into the waters of the United States. The control of pollutants discharged is established through effluent limitations and other requirements in NPDES permits. There are two principal bases for effluent limitations: 40 CFR §122.44(a) requires that permits include applicable technology-based limitations and standards; and 40 CFR §122.44(d) requires that permits include WQBELs to attain and maintain applicable numeric and narrative water quality criteria to protect the beneficial uses of the receiving water. Where numeric water quality objectives have not been established, three options exist to protect water quality: 1) 40 CFR §122.44(d) specifies that WQBELs may be established using USEPA criteria guidance under CWA section 304(a); 2) proposed State criteria or a State policy interpreting narrative criteria supplemented with other relevant information may be used; or 3) an indicator parameter may be established.

A. Discharge Prohibitions

The CWA requires point source discharges to control the amount of conventional, non-conventional, and toxic pollutants that are discharged into the waters of the United States. The control of pollutants discharged is established through effluent limitations; and other requirements in NPDES permits. There are two principal bases for effluent limitations: 40 CFR §122.44(a) requires that permits include applicable technology-based limitations and standards; and 40 CFR §122.44(d) requires that permits include water quality-based effluent limitations (WQBELs) to attain and maintain applicable numeric and narrative water quality criteria to protect the beneficial uses of the receiving water. Where numeric water quality objectives have not been established, three options exist to protect water quality: 1) 40 CFR §122.44(d) specifies that WQBELs may be established using USEPA criteria guidance under CWA section 304(a); 2) proposed State criteria or a State policy interpreting narrative criteria supplemented with other relevant information may be used; or 3) an indicator parameter may be established.

1. Discharge Prohibition III. A. The discharge of any waste not disclosed by the Discharger or not within the reasonable contemplation of the Regional Water Board is prohibited.

This prohibition is based on the Basin Plan, previous Order, and State Water Resources Control Board Order WQO 2002-0012 regarding the petition of WDR Order No. 01-072 for the East Bay Municipal Utility District and Bay Area Clean Water Agencies. In State Water Board Order WQO 2002-0012, the State Water Board found that this prohibition is acceptable in permits, but should be interpreted to apply only to constituents that are either not disclosed by the discharger or are not reasonably anticipated to be present in the discharge, but have not been disclosed by the Discharger. It specifically does not apply to constituents in the discharge that do not have "reasonable potential" to exceed water quality objectives.

The State Water Board has stated that the only pollutants not covered by this prohibition are those which were "disclosed to the permitting authority and . . . can be reasonably contemplated." (In re the Petition of East Bay Municipal Utilities District et al., (State Water Board 2002) Order No. WQ 2002-0012, p. 24.) The case cited in that order by the State Water Board reasoned that the Discharger is liable for discharges "not within the reasonable contemplation of the permitting authority . . . , whether spills or otherwise . . . ." (Piney Run Preservation Assn. v. County Commissioners of Carroll County, Maryland (4th Cir. 2001) 268 F.3d 255, 268.) Thus, State Water Board authority provides that, to be permissible, the constituent discharged (1) must have been disclosed by the Discharger and (2) can be reasonably contemplated by the Regional Water Board.

The Regional Water Board has the authority to determine whether the discharge of a constituent is "reasonably contemplated." The Piney Run case makes clear that the Discharger is liable for discharges "not within the reasonable contemplation of the

permitting authority . . . , whether spills or otherwise . . . ." (268 F.3d 255, 268 [italics added].) In other words, whether or not the Discharger reasonably contemplates the discharge of a constituent is not relevant. What matters is whether the Discharger disclosed the constituent to the Regional Water Board or whether the presence of the pollutant in the discharge can otherwise be reasonably contemplated by the Regional Water Board at the time of permit adoption.

2. **Discharge Prohibition III.B. Creation of a pollution, contamination, or nuisance, as defined by Section 13050 of the California Water Code (CWC) is prohibited.**

   This prohibition is based on CWC Section 13050. It has been retained from the previous order, Order No. R1-2000-025.

3. **Discharge Prohibition III.C. The discharge of sludge is prohibited, except as authorized under Section VI.C.6.d Solids Disposal and Handling Requirements.**

   This prohibition is based on restrictions on the disposal of sewage sludge found in federal regulations (40 CFR Part 503 (Biosolids) Part 527 and Part 258) and Title 27 CCR. It has been retained from previous Order.

4. **Discharge Prohibition III.D. The discharge of untreated or partially treated waste (receiving a lower level of treatment than described in Finding II.B) from anywhere within the collection, treatment, or disposal facility is prohibited, except as provided for in Attachment D, Standard Provision I.G *[Bypass Provision]*.**

   This prohibition has been retained from previous Order and is based on the Basin Plan to protect beneficial uses of the receiving water from unpermitted discharges, and the intent of CWC sections 13260 through 13264 relating to the discharge of waste to waters of the State without filing for and being issued a permit. This prohibition applies to, but is not limited to, sanitary sewer overflows, spills, and other unauthorized discharges of wastewater within the collection, treatment, reclamation, and disposal facilities. The discharge of untreated or partially treated wastewater from the collection, treatment, or disposal facility represents an unauthorized bypass pursuant to 40 CFR 122.41(m) or an unauthorized discharge which poses a threat to human health and/or aquatic life, and therefore, is explicitly prohibited by this Order.

5. **Discharge Prohibition III.E. The discharge of waste to land that is not owned by or under agreement to use by the Discharger is prohibited.**

   Land used for the application of wastewater must be owned by, or be under the control of, the Discharger by contract so that the Discharger maintains a means for ultimate disposal of treated wastewater.

6. **Discharge Prohibition III.F. The discharge of waste at any point, except Discharge Points 001 or 002, as described in the table on page 1 of this Order, or authorized by any State Water Board or other Regional Water Board permit is prohibited.**

   This prohibition is a general prohibition that allows the Discharger to discharge waste only in accordance with waste discharge requirements. It is based on Sections 301 and 402 of the federal CWA and CWC Section 13263.

7. **Discharge Prohibition III. G. The average daily dry weather flow (ADWF) of waste into the Discharger's Facility in excess of 0.19 mgd, as determined from the lowest consecutive 30-day mean daily flow, is prohibited.**

   The flow limitation of 0.190 mgd (average daily dry weather flow) is intended to ensure that wastewater flows do not exceed the Facility's design capacity. Provision VI.C.6.b. provides the opportunity for the Discharger to evaluate the current treatment capacity and plan for future expansion, if necessary.

8. **Discharge Prohibition III. H. The discharge of wastewater effluent from the WWTF to the Eel River or its tributaries is prohibited during the period May 15 through September 30 each year.**

   This prohibition is required by the Basin Plan, which prohibits discharges to the Eel River and its tributaries during the period May 15 through September 30 (Chapter 4, North Coastal Basin Discharge Prohibition No. 4). The original intent of this prohibition was to prevent the contribution of wastewater to the baseline flow of the Eel River during the period of the year when the Eel River experience the heaviest water-contact recreation use.

   i. 9. Discharge Prohibition III.I. During the period of October 1 through May 14, discharges of wastewater shall not exceed one percent of the flow of the Eel River.

   This prohibition is required by the Basin Plan (Chapter 4 Implementation Plans, North Coastal Basin Discharge Prohibition No. 4), which prohibits discharges to the Eel River when the waste discharge flow is greater than one percent of the receiving water's flow. Basin Plan Prohibition No. 4 does not specify how compliance to the one-percent flow requirement will be determined. The draft Order specifies that the discharge may comply with the one percent requirement as (1) a monthly average for the surface water discharge season, provided the Discharger makes a reasonable effort to adjust the discharge of treated wastewater to one percent of the most recent daily flow measurement of the Eel River as measured at the closest gauging station in Miranda, CA, (2) based on the daily flow measurements at the gauging station. This modification provides day-to-day operational flexibility for the Discharger while retaining the intent of the prohibition.

B. Technology-Based Effluent Limitations

1. Scope and Authority

Regulations promulgated in 40 CFR Section 125.3(a)(1) require technology-based effluent limitations for municipal Dischargers to be placed in NPDES permits based on Secondary Treatment Standards or Equivalent to Secondary Treatment Standards.

The Federal Water Pollution Control Act Amendments of 1972 (PL 92-500) established the minimum performance requirements for WWTFs [defined in Section 304(d)(1)]. Section 301(b)(1)(B) of that Act requires that such treatment works must, as a minimum, meet effluent limitations based on secondary treatment as defined by the USEPA Administrator.

Based on this statutory requirement, USEPA developed secondary treatment regulations, which are specified in 40 CFR 133. These technology-based regulations apply to all municipal wastewater treatment plants and identify the minimum level of effluent quality attainable by secondary treatment in terms of biochemical oxygen demand (BOD_5), total suspended solids (TSS), and pH, as follows:

a. BOD and Suspended Solids
   i. The 30-day average shall not exceed 30 mg/l.

   ii. The 7-day average shall not exceed 45 mg/l.

   iii. The 30-day average percent removal shall not be less than 85 percent.

b. pH
   i. The pH shall be maintained within the limits of 6.0 to 9.0.

      The effluent limitation for pH required to meet the water quality objective for hydrogen ion concentration (pH) is contained in the Basin Plan Table 3-1.

In addition, 40 CFR 122.45(f) requires the establishment of mass-based effluent limitations for all pollutants limited in permits, except, 1) for pH, temperature, radiation, or other pollutants which cannot appropriately be expressed by mass, and (2) when applicable standards and limitations are expressed in terms of other units of measure.

2. Applicable Technology-Based Effluent Limitations

a. Discharge Point 001 and 002

i. The following table summarizes concentration-based effluent limitations derived from 40 CFR 133.102, that are retained from Order No. R1-2000-025 with the exception of pH.

Summary of Technology-Based Effluent Limitations from 40CFR 133.102

Parameter	Units	Effluent Limitation		
		Avg Monthly	Avg Weekly	Daily Max
BOD (5-day @ 20° C)	mg/L	30	45	60
TSS	mg/L	30	45	60
Percent Removal [a]	%	85	---	---
pH	Standard Units	6.0 – 9.0		

[a] Order No. R1-2006-0022 specifies that percent removal for BOD and TSS shall be determined from the 30-day average value of influent wastewater concentration in comparison to the 30-day average value of effluent concentration for the same constituent over the same time period.

ii. Technology-based effluent limitations for coliform bacteria for secondary effluent discharges to the percolation ponds, which have been retained from the previous Order, reflect standards adopted by the Department of Health Services for secondary treated recycled water in Title 22, Division 4, Chapter 3 of the California Code of Regulations.

Coliform Effluent Limitations

Parameter	Units	Effluent Limitations [a]	
		Weekly Median	Maximum
Total Coliform Bacteria	mpn /100 mL	23	240

[a] The number of total coliform bacteria shall not exceed 23 per 100 ml in more than one sample in any 30-day period. No sample shall exceed an MPN of 230 total coliform bacteria per 100 ml.

iii. **Settleable Solids**. High levels of settleable solids can have an adverse effect on aquatic habitat. Untreated or improperly treated wastewater can contain high amounts of settleable solids. The Eel River and its tributaries are 303(d) listed for sediment and settleable solids is one aspect of the sediment impairing the Eel River.

Monthly average and maximum daily effluent limitations for settleable solids of 0.1 and 0.2 ml/L have been retained from the previous Order. These limitations are a typical standard of performance for secondary treatment facilities and are included as a limitation based on the best professional judgment of Regional Water Board staff.

iv. **Chlorine Residual**. The requirement for a minimum chlorine residual of 1.5 mg/l at the end of the disinfection process is retained from the previous Order and is based on Regional Water Board staffs' best professional judgment for providing adequate disinfection.

v. **Mass Limits.** Mass effluent limitations for BOD and TSS are retained from the previous Order and are required under CFR 122.45(f) for the purpose of assuring that dilution is not used as a method of achieving the concentration limitations in the permit. Mass-based effluent limitations are technology-based; thus these limitations apply at the end of the treatment train.

vi. **Percent Removal**. The percent removal requirements are standard secondary treatment technology-based effluent limitations derived from federal requirements (40 CFR 133.102; definition in 133.101) and are retained from the Order No. 96-9.

C. Water Quality-Based Effluent Limitations (WQBELs)

1. Scope and Authority

As specified in 40 CFR §122.44(d)(1)(i), permits are required to include WQBELs for pollutants (including toxicity) that are or may be discharged at levels that cause, have reasonable potential to cause, or contribute to an excursion above any state water quality standard. The process for determining reasonable potential and calculating WQBELs when necessary is intended to protect the designated uses for the receiving water as specified in the Basin Plan, and achieve applicable water quality objectives and criteria that are contained in other state plans and policies, or water quality criteria contained in the CTR and NTR.

2. Applicable Beneficial Uses and Water Quality Criteria and Objectives

a. Beneficial Uses. Applicable beneficial uses excerpted from the Basin Plan are presented in the Findings of Order No. R1-2006-0022 and Section III.C.1.a. of this Fact Sheet.

b. Basin Plan Water Quality Objectives. In addition to the specific water quality objectives indicated above, the Basin Plan contains narrative objectives for color, tastes and odors, floating material, suspended material, settleable material, oil and grease, biostimulatory substances, sediment, turbidity, pH, dissolved oxygen, bacteria, temperature, toxicity, pesticides, chemical constituents, and radioactivity that apply to inland surface waters, enclosed bays, and estuaries, including the Eel River.

c. State Implementation Policy (SIP), CTR and NTR.

Water quality criteria applicable to the discharge to the Eel River are included in the NTR and the CTR, which contain numeric criteria for most of the 126 priority pollutants, and indicates that such criteria will be developed for the remaining criteria at a future date.

Aquatic life freshwater and saltwater criteria are further identified as criterion maximum concentrations (CMC) and criterion continuous concentrations (CCC). The CTR defines the CMC as the highest concentration of a pollutant to which aquatic life can be exposed for a short period of time without deleterious effects and the CCC as the highest concentration of a pollutant to which aquatic life can be exposed for an extended period of time (4 days) without deleterious effects. The CMC is used to calculate an acute or one-hour average numeric effluent limitation and the CCC is used to calculate a chronic or 4-day average numeric effluent limitation.

Human health criteria are further identified as "water and organisms" and "organisms only." The criteria from the "water and organisms" column of CTR were used for the preliminary reasonable potential analysis because the Basin Plan identifies that the receiving water, the Eel River is a source of municipal and domestic drinking water supply. The human health criteria are used to calculate human health effluent limitations.

The SIP includes procedures for determining the need for and calculating WQBELs and requires dischargers to submit data sufficient to do so. Results of the reasonable potential analysis, water quality criteria and effluent limitation are presented in the following sections. A summary of the Reasonable Potential Analysis for all 126 priority pollutants is presented in Attachment F-1.

3. Determining the Need for WQBELs

a. Non-Priority Pollutants

i. Chlorine Residual. Order No. R1-2006-0022 contains an Effluent Limitation for total chlorine residual prior to surface water discharge. The Permit specifies that the discharge shall at no time show detectable chlorine residual. This effluent limitation is based on the Basin Plan narrative water quality objectives for toxicity and chemical constituents. This effluent limitation is included to ensure that a wastewater dechlorination step removes all detectable chlorine residual for the protection of aquatic beneficial uses of the receiving water. The Regional Water Board views any chlorinated discharge as having the potential to contribute to an exceedance of the Basin Plan's narrative toxicity objective – all waters shall be maintained free of toxic substances in concentrations which are toxic to, or which produce detrimental physiological responses in human, plant, animal, or aquatic life. The USEPA recommends a 4-day average (chronic) chlorine concentration of 0.01 mg/L for protection of fresh water aquatic life and a 1-hour (acute) concentration of 0.02 mg/L. [Quality Criteria for Water 1986 (The Gold Book), EPA 440/5-86-001 (May 1, 1986)]. These concentrations are, in effect, non-detectable concentrations by the common amperometric analytical method used for the measurement of chlorine; and therefore, the Regional Water Board has established an ND (not detected) level of chlorine as an effluent limitation for this discharge.

Dechlorination is not required when discharging to the percolation ponds.

ii. **pH.** Table 3-1 of the Basin establishes pH limits for discharge to the Eel River as 6.5 to 8.5. These limits are more restrictive than the federal standards. Basin Plan requirements have been applied only during the discharge season. The federal standards will be used during periods of discharge to the percolation ponds.

b. Priority Pollutants

The SIP Section 1.3 requires the Regional Water Board to use all available, valid, relevant, and representative receiving water and effluent data and information to conduct a reasonable potential analysis. Sufficient effluent and ambient data are available to conduct a complete RPA for the Facility. The Discharger collected two sets of priority pollutant data in March and December 2002.

Some freshwater water quality criteria for metals are hardness dependent; i.e., as hardness decreases, the toxicity of certain metals increases, and the applicable water quality criteria become correspondingly more stringent. For the reasonable potential analysis, a receiving water hardness concentration of 87 mg/L $CaCO_3$ was selected based on receiving water data submitted by the Discharger. Samples

in the Eel River, upstream of the discharge point, showed hardness concentrations between 87 and 110 mg/L. The use of the lowest receiving water hardness concentration provides the most protective approach for determining which parameters to require effluent limitations for, for the protection of aquatic life in the receiving stream.

To conduct the reasonable potential analysis, Regional Water Board staff identified the maximum observed effluent (MEC) and background (B) concentrations for each priority, toxic pollutant from receiving water and effluent data provided by the Discharger and compared this data to the most stringent applicable water quality criterion (C) for each pollutant from the NTR, CTR, and the Basin Plan. Section 1.3 of the SIP establishes three triggers for a finding of reasonable potential.

Trigger 1. If the MEC is greater than C, there is reasonable potential, and an effluent limitation is required.

Trigger 2. If B is greater than C, and the pollutant is detected in effluent (MEC > ND), there is reasonable potential, and an effluent limitation is required.

Trigger 3. After review of other available and relevant information, a permit writer may decide that a WQBEL is required. Such additional information may include, but is not limited to: the facility type, the discharge type, solids loading analyses, lack of dilution, history of compliance problems, potential toxic impact of the discharge, fish tissue residue data, water quality and beneficial uses of the receiving water, CWA 303 (d) listing for the pollutant, and the presence of endangered or threatened species or their critical habitat.

c. Reasonable Potential Determination

The reasonable potential analysis demonstrated reasonable potential for discharges from Discharge Monitoring Point 001 to cause or contribute to exceedances of applicable water quality criteria for dichlorobromomethane. The RPA determined that there is either no reasonable potential or there was insufficient information to conclude affirmative reasonable potential for the remainder of the other 126 priority pollutants.

The following section summarizes additional details regarding the data used for the reasonable potential analysis for dichlorobromomethane.

i. Dichlorobromomethane

CTR No.	Priority Pollutant	Lowest Applicable Water Quality Criteria(C)	Max Effluent Conc (MEC)	Maximum Detected Receiving Water Conc.(B)	RPA Result-Need Limit?	Reason	Recommendation
27	Dichlorobromomethane	0.56	1.6	<0.5	Yes	MEC>C	EL and monitoring needed

Dichlorobromomethane is a component of a group of chemicals commonly known as trihalomethanes (THM), which are formed during the disinfection process for drinking water and wastewater treatment through the reaction of chlorine and organic and inorganic material. Trihalomethanes are considered human carcinogens.

The CTR criterion for dichlorobromomethane to protect human health (30-Day average) for drinking water sources (consumption of water and aquatic organisms) is 0.56 µg/L.

Effluent monitoring data submitted by the Discharger detected 0.30 µg/ to 1.6 µg/L demonstrating that there is reasonable potential for dichlorobromomethane and effluent limitations are needed.

4. WQBEL Calculations

Final WQBELs for dichlorobromomethane have been determined using the methods described in Section 1.4 of the SIP.

Step 1: For each water quality criterion/objective, an effluent concentration allowance (ECA) is calculated from the following equation to account for dilution and background levels of each pollutant.

ECA = C + D (C - B), where

C = the applicable water quality criterion (adjusted for receiving water hardness and expressed as total recoverable metal, if necessary)
D = the dilution credit
B = the background concentration

Because no credit is being allowed for dilution, D = 0, and therefore, ECA = C.

Step 2: WQBELs, include an average monthly effluent limitation (AMEL) and a maximum daily effluent limitation (MDEL). When the most stringent water quality

criterion/objective is a human health criterion/objective, the AMEL is set equal to the ECA, and the MDEL is calculated by multiplying the ECA times the ratio of the MDEL multiplier to the AMEL multiplier.

From Table 2 of the SIP, when CV = 0.6 and n = 4, the MDEL/AMEL Multiplier (for MDEL at the 99th percentile occurrence probability and AMEL at the 95th percentile occurrence probability) equals 2.01. Final WQBELs for dichlorobromomethane are determined as follows.

Pollutant	ECA (µg/L)	MDEL/AMEL Multiplier	AMEL (µg/L)	MDEL (µg/L)
Dichlorobromomethane	0.56	2.01	0.56	1.1

All WQBELs for the Facility are summarized in the table below.

Summary of Water Quality-based Effluent Limitations

Parameter	Units	Effluent Limitations	
		Average Monthly	Maximum Daily
Chlorine Residual (to Eel River)	mg/L	No Detectable Levels using a minimum detection limit of 0.1 mg/l	
pH (to Eel River)	pH Units	6.5-8.5	
pH (to percolation ponds)	pH Units	6.0-9.0	
Dichlorobromomethane	µg/L	0.56	1.1

5. Whole Effluent Toxicity (WET)

Effluent limits for whole effluent toxicity (WET), acute or chronic, protect the receiving water quality from the aggregate toxic effect of a mixture of pollutants in the effluent. There are two types of WET tests - acute and chronic. An acute toxicity test is conducted over a short time period and measures mortality. A chronic toxicity test is conducted over a longer period of time and may measure mortality, reproduction, and/or growth.

The Basin Plan specifies a narrative objective for toxicity, requiring that all waters be maintained free of toxic substances in concentrations that are lethal to or produce other detrimental responses in aquatic organisms. Detrimental response includes, but is not limited to, decreased growth rate, decreased reproductive success of resident or indicator species, and/or significant alterations in population, community ecology, or receiving water biota. The existing Order contains acute toxicity limitations in accordance with the Basin Plan, which requires that average survival in undiluted

effluent for any three consecutive 96-hour static or continuous flow bioassay tests be at least 90 percent, with no single test having less than 70 percent survival.

In addition to the Basin Plan requirements, Section 4 of the SIP states that chronic toxicity effluent limitations are required in permits for all discharges that will cause, have the reasonable potential to cause, or contribute to chronic toxicity in receiving waters. Discharges from Discharge Point 001 may contribute to long-term toxic effects within the receiving water; however, no chronic toxicity data are available for this discharge. In accordance with the SIP, the Discharger will be required to conduct chronic toxicity testing in order to determine reasonable potential and establish WQBELs as necessary.

D. Final Effluent Limitations

1. Discharge Point 001, Direct Discharge to Eel River

Final effluent limitations for Discharge Point 001 are summarized below in the table and bulleted text.

Parameter	Units	Effluent Limitation		
		Average Monthly	Average Weekly	Maximum Daily
BOD_5 (5-day @ 20° C)	mg/L	30	45	60
	lbs/day	48	71	95
TSS [a]	mg/L	30	45	60
	lbs/day	48	71	95
Settleable Solids	mls/L	0.1	---	0.2
pH	stnd units	6.5 – 85		
Total Coliform	MPN	23	--	230
Chlorine	mg/L	---	--	ND [b]
Dichlorobromomethane	µg/L	0.56	--	0.11
% Removal		85	--	--

Notes:
[a] TSS = total suspended solids
[b] ND = not detected using an analytical method or chlorine analyzer with a minimum detection level of 0.1 mg/L.

There shall be no acute toxicity in the effluent when discharging to the Eel River, as measured at Monitoring Location M-001. The Discharger will be considered in compliance with this limitation when the survival of aquatic organisms in a 96-hour bioassay of undiluted waste complies with the following:

i. Minimum for any one bioassay: 70 percent survival

ii. Median for any three or more consecutive bioassays: at least 90 percent survival

Compliance with this effluent limitation shall be determined in accordance with Section V.A. of Monitoring and Reporting Program No. R1-2006-0022.

2. Discharge Point 002, Discharge to Percolation Ponds

Final effluent limitations for Discharge Point 002 and M-CCC are summarized below in the table and bulleted text.

Parameter	Units	Effluent Limitation		
		Average Monthly	Average Weekly	Maximum Daily
BOD_5 (5-day @ 20°C)	mg/L	30	45	60
TSS	mg/L	50	65	80
Settleable Solids	ml/L	0.1	---	0.2
pH	stnd units	6.0 – 9.0		
Chorine Residual				1.5 [a]
Coliform	MPN	23	--	230
% Removal		85	--	--

Notes:
[a] Daily minimum at Discharge Point M-CCC

E. Interim Effluent Limitations

This section of the standardized template is not applicable to the Redway Facility.

F. Land Discharge Specifications

This section of the standardized template is not applicable to the Redway Facility.

G. Reclamation Specifications

This section of the standardized template is not applicable to the Redway Facility.

V. RATIONALE FOR RECEIVING WATER LIMITATIONS

A. Surface Water

Receiving water limitations contained in this permit are derived from Chapter 3 of the Basin Plan. Several of the receiving water limitations were modified to more accurately reflect Basin Plan objectives for inland surface waters, enclosed bays, and estuaries contained in Chapter 3 of the Basin Plan. Narrative receiving water limitations that were modified include V.A.2. (pH), and V.A.11 (pesticides) and receiving water limitation V.A.14 (chemical constituents) was added. Narrative receiving water limitations for other water quality objectives identified in Chapter 3 of the Basin Plan remain unchanged from the existing permit, Order and are included in the draft Permit.

VI. RATIONALE FOR MONITORING AND REPORTING REQUIREMENTS

40 CFR 122.48 requires all NPDES permits to specify recording and reporting of monitoring results. CWC Sections 13267 and 13383 authorize the regional water boards to require technical and monitoring reports. The Monitoring and Reporting Program (MRP), Attachment E of this Order, establishes monitoring and reporting requirements to implement federal and state requirements. The following provides the rationale for the monitoring and reporting requirements contained in the Monitoring and Reporting Program for this facility.

A. Influent Monitoring

NPDES regulations at 40 CFR 133 define secondary treatment to include 85 percent removal of BOD_5 and TSS during treatment. Monitoring of influent for these pollutant parameters, in addition to effluent, is required to monitor compliance with this standard of performance.

Influent flow monitoring is required to monitor the water balance during treatment, and thereby, monitor seepage/percolation to ground water.

B. Effluent Monitoring

The draft MRP includes monitoring of the treated effluent for conventional and non-conventional pollutants prior to discharge to the percolation pond and surface waters to determine compliance with technology-based and water quality-based effluent limitations. The monitoring and reporting of influent and discharge flow is required to demonstrate compliance with mass emission limitations and flow limitations.

C. Whole Effluent Toxicity Testing Requirements

Whole effluent toxicity (WET) protects the receiving water quality from the aggregate toxic effect of a mixture of pollutants in the effluent. Acute toxicity testing measures mortality in 100 percent effluent over a short test period, and chronic toxicity testing is conducted over a longer period of time and may measure mortality, reproduction, and/or growth. This Order includes effluent limitations and monitoring requirements for acute toxicity, as well as monitoring requirements for chronic toxicity, to determine compliance with the Basin Plan's narrative water quality objective for toxicity.

D. Receiving Water Monitoring

The draft MRP includes monitoring of the Eel River to monitor effluent impacts on receiving water quality. Compliance with receiving water limitations will be demonstrated by grab samples taken upstream of Discharge Point 001 when discharging to the Eel River.

E. Other Monitoring Requirements – Not Applicable

This section of the standardized template is not applicable as there are no other monitoring requirements applicable to the Redway Community Services District.

VII. RATIONALE FOR PROVISIONS

A. Standard Provisions

Standard Provisions, which in accordance with 40 CFR §§122.41and 122.42, apply to all NPDES discharges and must be included in every NPDES permit, are provided in Attachment D to the Order. Effluent limitations, and toxic and pretreatment effluent standards established pursuant to Sections 208(b), 301, 302, 303(d), 304, 306, and 307 of the CWA and amendments thereto are applicable to the Discharger.

B. Special Provisions

1. Reopener Provisions

Provision VI.C.1 contains a reopener provision. The Regional Water Board may reopen the permit to modify permit conditions and requirements. Causes for modifications include demonstration that the Discharger is causing or significantly contributing to adverse impacts to water quality and/or beneficial uses of receiving waters; new interpretation of water quality objectives of the Basin Plan; or if effluent monitoring or other new information demonstrates reasonable potential for any pollutant or pollutant parameter with applicable water criteria established by the NTR, CTR, or Basin Plan.

2. Special Studies and Additional Monitoring Requirements

a. The Discharger currently disposes of dried municipal sludge in trenches on their property north of the WWTF. Although this practice has not shown any obvious problems, this manner of disposal is not consistent with state and federal requirements. During the term of Order R1-2006-0022, the discharger is required to conduct a special study to evaluate, select and implement a sludge disposal method consistent with current regulations.

b. The engineered design capacity for average dry weather flow (ADWF) at the WWTF is 0.186 MGD. The Discharger reports ADWF over the last three years ranging between 0.141 and 0.182 MGD. During the term of Order R1-2006-0022, the discharger is required to conduct a special study to evaluate continued community growth patterns and develop plans to address WWTF capacity to accommodate continued growth, as necessary.

3. Best Management Practices and Pollution Prevention

Provision VI.C.3 is included in Order No. R1-2006-0022 as required by Section 2.4.5 of the SIP. The Regional Water Board includes standard provisions in all NPDES permits requiring development of a Pollutant Minimization Program when there is evidence that a toxic pollutant is present in effluent at a concentration greater than an applicable effluent limitation.

4. Compliance Schedules

Detection of Dichlorobromomethane in samples collected during the last permit term indicated reasonable potential for excursions above water quality criteria in the receiving water, requiring establishment of new a new effluent limitation. One of two samples collected for Dichlorobromomethane indicated effluent concentrations exceeding water quality criteria. During the term of Order R1-2006-0022, the discharger is required to collect additional monitoring data, evaluate WWTF processes, and determine appropriate measures to be taken to meet the newly established water quality effluent limitation no later than May 18, 2010.

5. Construction, Operation, and Maintenance Specifications

40 CFR 122.41 (e) requires proper operation and maintenance of permitted wastewater systems and related facilities to achieve compliance with permit conditions. An up-to-date operation and maintenance manual, as required by Provision VI.C.5.a.i. of the permit, is an integral part of a well-operated and maintained facility.

6. Special Provisions for Municipal Facilities (WWTFs Only)

The Regional Water Board includes standard provisions in all NPDES permits for municipal wastewater treatment facilities regarding wastewater collection systems, sanitary sewer overflows, source control, sludge handling and disposal, operator certification, and adequate capacity. These provisions assure efficient and satisfactory operation of municipal wastewater collection and treatment systems.

a. **Wastewater Collection System (ProvisionVI.C.6.a)**

The USEPA has prepared a draft proposed rule intended to address the control of sanitary sewer overflow from municipal wastewater collection systems. The core requirement in the draft Rule is for proper system management under the framework of "CMOM." The proposed CMOM (for Capacity, Management, Operations and Maintenance) rule was to be published in the Federal Register by late 2002, after final review by the federal executive branch. The intent of the Rule is to eliminate "preventable" SSOs by requiring entities to implement appropriate capacity, management, operations, and maintenance practices. The

permit conditions under the proposed draft rule will be derived from the CWA sections 304(i), 308, and 402(a).

A CMOM program is a structured program for managers of wastewater collection system to optimize system performance and maintain their facilities. CMOM is an iterative process of evaluating and improving procedures for managing collection systems and ensuring system performance. Under USEPA's draft proposed sanitary sewer overflow (SSO) Rule, collection system utilities must meet five performance standards:

- Properly manage, operate and maintain all parts of the collection system;
- Provide adequate conveyance capacity;
- Reduce the impact of any SSOs;
- Provide notification to parties who may be exposed to a SSO; and
- Document the CMOM program in a written plan.

The State Water Board is moving forward with implementation of the proposed federal rule, but has of yet not promulgated statewide regulations. Nevertheless, proper management of the municipal wastewater collection system is an integral component of a properly operating publicly owned treatment works as required by 40 CFR 122.41 (e). This Order incorporates many of the goals of the EPA's proposed CMOM program.

b. **Sanitary Sewer Overflows (Provision VI.C.6.b)**

The Permit contains provisions that require development and implementation of a management, operation, and maintenance program for its wastewater collection system and clearly identifies the reporting requirements for sanitary sewer overflows. The goal of these provisions is to ensure appropriate and timely response by the Discharger to sanitary sewer overflows to protect public health and water quality. The Plan also includes provisions to ensure adequate notifications are made to the appropriate local, state, and federal authorities.

c. **Source Control (Provision VI.C.6.c)**

Because the design flow of the Facility is less than 5.0 mgd, the Permit does not require the Discharger to develop a Pretreatment Program that conforms to federal regulations. Due to the identification of the reasonable potential for the priority pollutant dichlorobromomethane in the discharge, the proposed Order includes requirements for the development of a Source Identification and Reduction Plan.

The Source Identification and Reduction Plan will need to address only those pollutants that continue to be detected at levels that trigger reasonable potential.

In addition, the Regional Water Board recognizes that some form of source control is prudent to ensure the efficient operation of the treatment facility, the safety of District staff, and to ensure that pollutants do not pass through the treatment facility to impair the beneficial uses of the receiving water. The proposed Order includes prohibitions for the discharge of pollutants that may interfere, pass through, or be incompatible with treatment operations, interfere with the use or disposal of sludge, or pose a health hazard to personnel. In addition, the proposed Order includes general guidance to develop an effective Pretreatment Program in the event that a Pretreatment Program is necessary.

d. **Sludge Requirements (Provision VI.C.6.d)**

The disposal or reuse of wastewater treatment screenings, sludges, or other solids removed from the liquid waste stream is regulated by 40 CFR Parts 257, 258, 501, and 503, the State Water Board promulgated provisions of Title 27, Division 2, of the CCR, and with the Water Quality Control Plan for Ocean Waters of California (California Ocean Plan). Currently dewatered sludge is buried on property owned by the Discharger.

e. Operator Certification

This provision requires the Facility to be operated by supervisors and operators who are certified as required by Title 23, CCR, Section 3680.

f. Adequate Capacity

The goal of this provision is to ensure appropriate and timely planning by the Discharger to ensure adequate capacity for the protection of public health and water quality.

7. **Other Special Provisions**

a. Stormwater

This provision requires the Discharger to comply with the State's regulations relating to regulation of industrial stormwater activities.

b. Sludge Disposal.

Currently dewatered sludge is buried on property owned by the Discharger. Staff is concerned that this disposal method is not in compliance with federal and State regulations. In addition, burial may not be a sustainable viable long-term option.

Therefore, the draft Order contains a new Provision to evaluate and select alternative disposal methods in accordance with a time schedule.

VIII. PUBLIC PARTICIPATION

The California Regional Water Quality Control Board, North Coast Region (Regional Water Board) is considering the issuance of waste discharge requirements (WDRs) that will serve as a National Pollutant Discharge Elimination System (NPDES) permit for Redway Community Service District wastewater treatment facility. As a step in the WDR adoption process, the Regional Water Board staff has developed tentative WDRs. The Regional Water Board encourages public participation in the WDR adoption process.

A. Notification of Interested Parties

The Regional Water Board has notified the Discharger and interested agencies and persons of its intent to prescribe waste discharge requirements for the discharge and has provided them with an opportunity to submit their written comments and recommendations. Notification was provided through publication in the Eureka Times Standard on March 17, 2006 and through posting on the Regional Water Board's internet site at http://www.waterboards.ca.gov/northcoast/agenda/pending.html beginning on March 17, 2006.

B. Written Comments

The staff determinations are tentative. Interested persons are invited to submit written comments concerning these tentative WDRs. Comments must be submitted either in person or by mail to the Executive Officer at the Regional Water Board at the address above on the cover page of this Order.

To be fully responded to by staff and considered by the Regional Water Board, written comments must be received at the Regional Water Board offices by 5:00 p.m. on April 17, 2006

C. Public Hearing

The Regional Water Board will hold a public hearing on the tentative WDRs during its regular Board meeting on the following date and time and at the following location:

Date:	**May 17, 2006**
Time:	**9:00 a.m.**
Location:	**River Lodge** **1800 Riverwalk** **Fortuna, CA 95540**

Interested persons are invited to attend. At the public hearing, the Regional Water Board will hear testimony, if any, pertinent to the discharge, WDRs, and permit. Oral testimony will be heard; however, for accuracy of the record, important testimony must be in writing.

Please be aware that dates and venues may change. Our web address is http://www.waterboards.ca.gov/northcoast where you can access the current agenda for changes in dates and locations.

D. Waste Discharge Requirements Petitions

Any aggrieved person may petition the State Water Resources Control Board to review the decision of the Regional Water Board regarding the final WDRs. The petition must be submitted within 30 days of the Regional Water Board's action to the following address:

State Water Resources Control Board
Office of Chief Counsel
P.O. Box 100
Sacramento, CA 95812-0100

E. Information and Copying

The Report of Waste Discharge (ROWD), related documents, tentative effluent limitations and special provisions, comments received, and other information are on file and may be inspected at the address above at any time between 8:30 a.m. and 5:00 p.m., Monday through Friday. Copying of documents may be arranged through the Regional Water Board by calling (707) 576-2220.

F. Register of Interested Persons

Any person interested in being placed on the mailing list for information regarding the WDRs and NPDES permit should contact the Regional Water Board, reference this facility, and provide a name, address, and phone number.

G. Additional Information

Requests for additional information or questions regarding this Order should be directed to Lisa Bernard at (707) 576-2677 or Lbernard@waterboards.ca.gov.